

EXHIBIT P

From: [Bret Stanley](#)
To: [Veronica G. Gromada](#); [Chris Cox](#)
Subject: RE: Soto Matter - Motion to Enforce PO
Date: Wednesday, August 20, 2025 3:22:00 PM

Chris – sorry for filling your inbox.

Veronica, the wrong email auto-populated below.

See below RE the Soto Matter.

From: Bret Stanley
Sent: Wednesday, August 20, 2025 3:17 PM
To: Veronica Stewart <vstewart@peifferwolf.com>; Chris Cox <christopher.cox@kirkland.com>
Subject: Soto Matter - Motion to Enforce PO

Veronica and Chris –

I don't have any connection to any counsel in the Soto matter and did not disclose anything to that firm.

Thanks –

Bret

EXHIBIT Q

From: Bret Stanley
To: Gromada, Veronica G. (SHB); Chris Cox
Cc: Priest Johnson, Kimberly (SHB); Shortnacy, Michael (SHB); Kirk, Brittany E. (SHB); St. Amand, Amy
Subject: Re: Soto Matter - Motion to Enforce PO
Date: Friday, August 22, 2025 12:18:26 PM
Attachments: [image001.png](#)
[image002.png](#)

I do not know the lawyers in the Soto matter and did not disclose the documents to any lawyers in Soto. I know nothing about that case or who the firms involved.

I have instructed all attorneys to delete what they have seen that is in violation according to Cisneros and provided the Order to the Courts subject to my disclosure.

I'm happy to talk about this and this email should not be construed with a negative tone.

Get [Outlook for iOS](#)

From: Gromada, Veronica G. (SHB) <vgromada@shb.com>
Sent: Friday, August 22, 2025 12:06:10 PM
To: Bret Stanley <BStanley@johnsonlawgroup.com>; Chris Cox <christopher.cox@kirkland.com>
Cc: Priest Johnson, Kimberly (SHB) <kpj@shb.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>; Kirk, Brittany E. (SHB) <bkirk@shb.com>; St. Amand, Amy <amy.stamand@kirkland.com>
Subject: Soto Matter - Motion to Enforce PO

[EXTERNAL]

Hi, Bret.

We wanted to confirm where things stand on Soto. As you are aware from Uber's submissions to the court, Confidential Information has been used or disclosed in discovery or otherwise in Soto. Our reading of the Court's Order on Defendants' Motion to Enforce Protective Order is that within three days of the Order, you:

- shall provide a copy of the Order to counsel and the court in Soto; and
- take reasonable efforts to retrieve or ensure the destruction of **all** unauthorized Confidential information.

Please confirm whether these steps have been taken.

Thank you.

From: Bret Stanley <BStanley@johnsonlawgroup.com>
Sent: Wednesday, August 20, 2025 3:23 PM
To: Gromada, Veronica G. (SHB) <vgromada@shb.com>; Chris Cox <christopher.cox@kirkland.com>
Subject: RE: Soto Matter - Motion to Enforce PO

EXTERNAL

Chris – sorry for filling your inbox.

Veronica, the wrong email auto-populated below.

See below RE the Soto Matter.



Bret Stanley | Senior Counsel

Johnson Law Group | 2925 Richmond Ave., Suite 1700 | Houston, Texas 77098
Toll Free (800) 230-7700 | Phone (713) 626-9336 | Fax (713) 583-9460
BStanley@johnsonlawgroup.com | www.johnsonlawgroup.com

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From: Bret Stanley

Sent: Wednesday, August 20, 2025 3:17 PM

To: Veronica Stewart <vstewart@peifferwolf.com>; Chris Cox <christopher.cox@kirkland.com>

Subject: Soto Matter - Motion to Enforce PO

Veronica and Chris –

I don't have any connection to any counsel in the Soto matter and did not disclose anything to that firm.

Thanks –

Bret

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EXHIBIT R

From: [Bret Stanley](#)
To: [Gromada, Veronica G. \(SHB\)](#); [Steven Cohn](#); [Chris Cox](#)
Cc: [Roopal Luhana](#); [Rachel Abrams](#); [Sarah London](#); [Andrew Kaufman](#); [An Truong](#); [Priest Johnson, Kimberly \(SHB\)](#); [Shortnacy, Michael \(SHB\)](#)
Subject: Re: In re Uber, Proposed Joint Order re Protective Order
Date: Friday, August 22, 2025 7:19:17 PM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

Veronica-

I didn't disclose anything to the Soto counsel. I informed you I had no knowledge of which court the case was in or who counsel was.

Stop playing games. If you have information, then share it.

If you would prefer to go to the Court, I'll be there.

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From: Gromada, Veronica G. (SHB) <vgromada@shb.com>
Sent: Friday, August 22, 2025 5:54:08 PM
To: Steven Cohn <cohn@chaffinluhana.com>; Bret Stanley <bstanley@johnsonlawgroup.com>; Chris Cox <christopher.cox@kirkland.com>
Cc: Roopal Luhana <Luhana@chaffinluhana.com>; Rachel Abrams <rabramps@peifferwolf.com>; Sarah London <slondon@girardsharp.com>; Andrew Kaufman <akaufman@girardsharp.com>; An Truong <atruong@simmonsfirm.com>; Priest Johnson, Kimberly (SHB) <kpj@shb.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>
Subject: In re Uber, Proposed Joint Order re Protective Order

[EXTERNAL]

Bret,

As you know, the Court entered an Order on August 18, 2025 regarding the Protective Order violations. You and the PSC agreed to that Order.

Among other things, the August 18, 2025 Order requires that within three days (August 21, 2025), you:

...identify to Defendants' counsel all persons outside of the MDL litigation to whom Mr. Stanley has disclosed any information covered by the Protective Order, including without limitation, the

Confidential Information, and Mr. Stanley shall identify to Defendants' counsel all court proceedings in which Mr. Stanley is aware that the Confidential Information has been used or disclosed in discovery or otherwise;

(d) Within three days of the date of this Order, Mr. Stanley shall provide a copy of this Order to all persons and courts identified pursuant to paragraph (c) of this Order with notice to Defendants' Counsel of same...

Thus, you were not simply required to identify persons to whom you disclosed confidential information, but also to identify "all court proceedings in which [you are] **aware**" that confidential information has been disclosed and provide a copy of the August 18, 2025 Order to those courts.

You have failed to comply with the August 18, 2025 Order as follows:

1. Lord: You have not provided a copy of the August 18, 2025 Order to the court.
2. Casey Jones: Even though you are aware that confidential information is being used in this case, you have not provided a copy of the August 18, 2025 Order to the court.
3. Soto: Even though you are aware that confidential information is being used in this case and has been disclosed to the plaintiff's counsel, you have not provided notice and a copy of the August 18, 2025 Order to the plaintiff's counsel or to the court.

In addition to the August 18, 2025 Order, the MDL Protective Order separately requires certain actions in the event confidential information is disclosed. [ECF, par. 10]

We intend to raise your non-compliance with the August 18, 2025 Order with the MDL Court if the above violations are not remedied by 3:00pm PST on Monday, August 25, 2025.

Veronica G. Gromada

Partner

Shook, Hardy & Bacon L.L.P.

713-546-5683 | vgromada@shb.com



From: Gromada, Veronica G. (SHB) <vgromada@shb.com>
Sent: Friday, August 15, 2025 3:52 PM
To: Steven Cohn <cohn@chaffinluhana.com>; Chris Cox <christopher.cox@kirkland.com>; Bret Stanley <bstanley@johnsonlawgroup.com>
Cc: Roopal Luhana <Luhana@chaffinluhana.com>; Rachel Abrams <rabraams@peifferwolf.com>; Sarah London <slondon@girardsharp.com>; Andrew Kaufman <akaufman@girardsharp.com>; An Truong <atruong@simmonsfirm.com>; Priest Johnson, Kimberly (SHB) <kpj@shb.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>
Subject: RE: In re Uber, Proposed Joint Order re Protective Order

Steve and Bret,

Defendants accept the proposed edits. We will present the revised version to the court as an agreed proposed order.

Thank you.

From: Steven Cohn <cohn@chaffinluhana.com>
Sent: Friday, August 15, 2025 2:12 PM
To: Gromada, Veronica G. (SHB) <vgromada@shb.com>; Chris Cox <christopher.cox@kirkland.com>; Bret Stanley <bstanley@johnsonlawgroup.com>
Cc: Roopal Luhana <Luhana@chaffinluhana.com>; Rachel Abrams <rabraams@peifferwolf.com>; Sarah London <slondon@girardsharp.com>; Andrew Kaufman <akaufman@girardsharp.com>; An Truong <atruong@simmonsfirm.com>; Priest Johnson, Kimberly (SHB) <kpj@shb.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>
Subject: Re: In re Uber, Proposed Joint Order re Protective Order

EXTERNAL

Veronica,

Our proposed edits are attached in redline.

Thanks,
Steve

Steven Cohn | Partner
E: cohn@chaffinluhana.com
P: (347) 269-4465

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From: Steven Cohn <cohn@chaffinluhana.com>
Sent: Friday, August 15, 2025 1:43 PM
To: Gromada, Veronica G. (SHB) <vgromada@shb.com>; Chris Cox <christopher.cox@kirkland.com>;
Bret Stanley <bstanley@johnsonlawgroup.com>
Cc: Roopal Luhana <Luhana@chaffinluhana.com>; Rachel Abrams <rabramps@peifferwolf.com>;
Sarah London <sondon@girardsharp.com>; Andrew Kaufman <akaufman@girardsharp.com>; An
Truong <atruong@simmonsfirm.com>; Priest Johnson, Kimberly (SHB) <kpj@shb.com>; Shortnacy,
Michael (SHB) <mshortnacy@shb.com>
Subject: Re: In re Uber, Proposed Joint Order re Protective Order

Veronica,

We should have our proposed edits to you shortly.

Thank you,
Steve

Steven Cohn | Partner
E: cohn@chaffinluhana.com
P: (347) 269-4465

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From: Gromada, Veronica G. (SHB) <vgromada@shb.com>
Sent: Friday, August 15, 2025 11:48 AM
To: Steven Cohn <cohn@chaffinluhana.com>; Chris Cox <christopher.cox@kirkland.com>; Bret Stanley <bstanley@johnsonlawgroup.com>
Cc: Roopal Luhana <Luhana@chaffinluhana.com>; Rachel Abrams <rabramps@peifferwolf.com>; Sarah London <slondon@girardsharp.com>; Andrew Kaufman <akaufman@girardsharp.com>; An Truong <atruong@simmonsfirm.com>; Priest Johnson, Kimberly (SHB) <kpj@shb.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>
Subject: RE: In re Uber, Proposed Joint Order re Protective Order

Good morning, Steve and Bret.

We're following up regarding the proposed joint order sent yesterday. Do you have any comments regarding the proposed order? We would like to prepare the submission before the end of the workday.

Please let us know your thoughts.

Thank you.

From: Gromada, Veronica G. (SHB) <vgromada@shb.com>
Sent: Thursday, August 14, 2025 1:28 PM
To: Steven Cohn <cohn@chaffinluhana.com>; Chris Cox <christopher.cox@kirkland.com>
Cc: Roopal Luhana <Luhana@chaffinluhana.com>; Rachel Abrams <rabramps@peifferwolf.com>; Sarah London <slondon@girardsharp.com>; Bret Stanley <bstanley@johnsonlawgroup.com>; Andrew Kaufman <akaufman@girardsharp.com>; An Truong <atruong@simmonsfirm.com>; Priest Johnson, Kimberly (SHB) <kpj@shb.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>
Subject: RE: In re Uber, Proposed Joint Order re Protective Order

Steve,

Please see the attached proposed order for your review.

Thanks

From: Steven Cohn <cohn@chaffinluhana.com>
Sent: Thursday, August 14, 2025 11:24 AM
To: Gromada, Veronica G. (SHB) <vgromada@shb.com>; Chris Cox <christopher.cox@kirkland.com>
Cc: Roopal Luhana <Luhana@chaffinluhana.com>; Rachel Abrams <rabramps@peifferwolf.com>; Sarah London <slondon@girardsharp.com>; Bret Stanley <bstanley@johnsonlawgroup.com>; Andrew Kaufman <akaufman@girardsharp.com>; An Truong <atruong@simmonsfirm.com>; Priest Johnson, Kimberly (SHB) <kpj@shb.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>
Subject: Re: In re Uber, Proposed Joint Order re Protective Order

EXTERNAL

Thank you.

Steven Cohn | Partner
E: cohn@chaffinluhana.com
P: [\(347\) 269-4465](tel:(347)269-4465)

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From: Gromada, Veronica G. (SHB) <vgromada@shb.com>
Sent: Thursday, August 14, 2025 12:22 PM
To: Steven Cohn <cohn@chaffinluhana.com>; Chris Cox <christopher.cox@kirkland.com>
Cc: Roopal Luhana <Luhana@chaffinluhana.com>; Rachel Abrams <rabramps@peifferwolf.com>; Sarah London <slondon@girardsharp.com>; Bret Stanley <bstanley@johnsonlawgroup.com>; Andrew Kaufman <akaufman@girardsharp.com>; An Truong <atruong@simmonsfirm.com>; Priest Johnson, Kimberly (SHB) <kpj@shb.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>
Subject: In re Uber, Proposed Joint Order re Protective Order

Hi, Steve.

We're working on a draft Order and will have it to you in about an hour.

Thanks.

From: Steven Cohn <cohn@chaffinluhana.com>
Sent: Thursday, August 14, 2025 9:01 AM
To: Chris Cox <christopher.cox@kirkland.com>; Gromada, Veronica G. (SHB) <vgromada@shb.com>
Cc: Roopal Luhana <Luhana@chaffinluhana.com>; Rachel Abrams <rabramps@peifferwolf.com>; Sarah London <slondon@girardsharp.com>; Bret Stanley <bstanley@johnsonlawgroup.com>; Andrew Kaufman <akaufman@girardsharp.com>; An Truong <atruong@simmonsfirm.com>
Subject: In re Uber, Proposed Joint Order re Protective Order

EXTERNAL

Veronica/Chris,

Per the Court's Order (ECF 3692), please let us know if you are available to meet and confer this afternoon regarding the Proposed Order related to the Protective Order. Alternatively, if you can send us a draft proposed order, we can review and let you know if we agree or have any proposed edits (and then meet and confer if there are any issues that remain).

Thanks,
Steve

Steven Cohn | Partner
E: cohn@chaffinluhana.com
P: (347) 269-4465

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Mailing Address:

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EXHIBIT S



August 14, 2025

Veronica G. Gromada

VIA EMAIL

Corey J. Gaul (cgaul@gaul-law.com)
Gaul, Baratta & Rosello, LLC
100 Hanover Avenue
Cedar Knolls, New Jersey 07927

JPMorgan Chase Tower
600 Travis St., Suite 3400
Houston, Texas 77002
t 713.227.8008
f 713.227.9508

Re: Protective Order Violations

In re: Uber Technologies, Inc. Passenger Sexual Assault Litigation
Case No. 2:23-md-03084-CRB

Counsel:

As you are aware, we represent Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Uber”), in the above captioned MDL litigation.

On July 21, 2025, we informed you that the MDL Protective Order was being violated through Bret Stanley’s use and disclosure of a spreadsheet he compiled using information extracted from Confidential and Highly Confidential/Attorneys’ Eyes Only (“AEO”) MDL documents. Our July 21, 2025 letter further advised you that Uber had filed a Motion to Enforce the Protective Order in the MDL to address Mr. Stanley’s violations. We further demanded that you cease any use or disclosure of information covered by the Protective Order and refrain from aiding and abetting Mr. Stanley’s ongoing violations of the Protective Order including, but not limited to, using the spreadsheet Mr. Stanley compiled to prosecute *Soto v. Uber Technologies, Inc.*, or any other case against Uber.

The MDL Court held a hearing on Uber’s Motion to Enforce the Protective Order on August 12, 2025 and found on the record that Mr. Stanley violated the Protective Order in using the information identified in Uber’s Motion to Enforce the Protective Order, which is confidential information covered by the Protective Order, in litigation outside of the MDL litigation. A copy of the Court’s Minute Order reflecting these findings is enclosed.

Pursuant to Paragraph 10 of the Protective Order, Mr. Stanley is required to take immediate remedial action as follows:



10. UNAUTHORIZED DISCLOSURE OF PROTECTED MATERIAL If a Receiving Party learns that, by inadvertence or otherwise, it has disclosed Protected Material to any person or in any circumstance not authorized under this Stipulated Protective Order, the Receiving Party must immediately (a) notify in writing the Designating Party of the unauthorized disclosures, (b) use reasonable efforts to retrieve all unauthorized copies of the Protected Material, (c) inform the person or persons to whom unauthorized disclosures were made of all the terms of this Order, and (d) request such person or persons to execute the "Acknowledgment and Agreement to Be Bound" that is attached hereto as Exhibit A. [ECF 176]

August 14, 2025
Page 2

Because the MDL Court found that Mr. Stanley's actions violated the Protective Order, all use and/or disclosure of information covered by the Protective Order must immediately cease. Likewise, efforts to remediate the violation and all effects therefrom must commence immediately. We appreciate your immediate attention to this issue.

Very truly yours,

A handwritten signature in blue ink that reads "Veronica Hayes Gromada".

Veronica G. Gromada

**OFFICE OF THE CLERK
UNITED STATES DISTRICT COURT
Northern District of California**

CIVIL MINUTES

Date: August 12, 2025	Time: 11:35 a.m.-12:04 p.m.	Judge: LISA J. CISNEROS
Case No.: 3:23-md-03084-CRB	Case Name: In re: Uber Technologies, Inc.	

For Plaintiff: Bret Stanley and Steven Cohn

For Defendant: Christopher Cox and Veronica Gromada

Deputy Clerk: Brittany Sims

Reported by: Irene Rodriguez

PROCEEDINGS

Hearing on Motion to Enforce Protective Order (Dkt. No. 3152) held. The Court heard arguments from the parties. The Court held on the record that Plaintiffs' attorney Bret Stanley violated the protective order by disclosing the complete substantive contents of certain documents produced in discovery and designated as confidential, i.e., lists of policy documents and the manner in which Uber organized them. The Court determined that Uber's proposed relief (a finding of violation, and requiring Stanley to identify others to whom he disclosed such information and share with them a copy of the Court's order) is justified, but that Uber's proposed order is vague and potentially overbroad as to the confidential material at issue, such that a recipient might not know what material is covered. The Court ordered the parties to file within three business days (by August 15, 2025) either a joint revised proposed order or separate revised proposed orders consistent with that determination. Plaintiffs' filing or joining in a proposed order consistent with the Court's ruling shall not be deemed a waiver of any right to seek relief from that ruling.

EXHIBIT T

GAUL, BARATTA & ROSELLO, LLC

ATTORNEYS AT LAW

100 HANOVER AVENUE
CEDAR KNOLLS, NJ 07927

JOSEPH M. GAUL, JR.*
JESSICA A. BARATTA†
LAWRENCE F. ROSELLO
COREY J. GAUL^
SHANNON BURKE
LARS M. SWANSON °
JOSHUA E. ZOELLER

—
JAMES C. HAGGERTY °^
OF COUNSEL

(973) 539-5900
FAX (973) 539-0059

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239 Washington Street, Suite 303
Jersey City, NJ 07302

NEW YORK OFFICE
280 Madison Avenue, Suite 810
New York, NY 10016

PLEASE RESPOND TO CEDAR KNOLLS

* Certified by the Supreme Court
of New Jersey as a Civil Trial Attorney

† also admitted in Pennsylvania

° also admitted in Washington, D.C.

^ also admitted in New York

Sender's Direct E-mail:
cgaul@gaul-law.com

August 28, 2025

Via E-Courts

The Honorable Joseph A. Turula, P.J.Cv
Hudson County Superior Court
583 Newark Ave.
Floor 2, Room 2D
Jersey City, NJ 07306

Re: Soto, Daniel v. Grancaric, Monica
Docket No: HUD-L-3700-23
File No.: 20-9002 CJG

Dear Judge Turula:

We represent plaintiffs in the above captioned matter. In accordance with the attached Order, Bret Stanley, Esq. has asked that I supply this Order to the Court.

Respectfully Submitted,

GAUL, BARATTA & ROSELLO

/s/ Corey J. Gaul

COREY J. GAUL

CJG/js

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**[PROPOSED] ORDER ON DEFENDANTS
UBER TECHNOLOGIES, INC., RASIER,
LLC, RASIER-CA, LLC'S MOTION TO
ENFORCE PROTECTIVE ORDER**

This Document Relates to:

ALL ACTIONS

1 This cause coming before the Court on Defendants Uber Technologies, Inc., Rasier, LLC and
2 Raiser-CA, LLC's Motion to Enforce Protective Order, due notice given and the Court being fully
3 advised, THE COURT HEREBY FINDS:

4 (a) The information on the 587 rows of the spreadsheet sent by Bret Stanley to Defendants'
5 counsel on October 9, 2024, which identifies Defendants' internal policy related resources and the
6 repository where each resource is maintained and which are accompanied by MDL Bates numbers
7 (identifiable as the first 587 rows on the version of the spreadsheet attached as Exhibit 3 to the
8 Declaration of Veronica Gromada [ECF 3512-1]) ("Confidential Information"), is covered by the
9 Protective Order, which requires the Confidential Information be used "only for prosecuting,
10 defending, or attempting to settle this Action or the [related JCCP] consolidated action" [ECF 176, ¶
11 7.1];

12 (b) Based on the record presented, Mr. Stanley has violated the Protective Order [ECF
13 176], by using and disclosing the Confidential Information outside of the MDL Litigation.

14 Accordingly, IT IS HEREBY ORDERED:

15 (c) Within three days of the date of this Order, Mr. Stanley shall identify to Defendants'
16 counsel all persons outside of the MDL Litigation to whom Mr. Stanley has disclosed any information
17 covered by the Protective Order, including without limitation, the Confidential Information, and Mr.
18 Stanley shall identify to Defendants' counsel all court proceedings in which Mr. Stanley is aware that
19 the Confidential Information has been used or disclosed in discovery or otherwise;

20 (d) Within three days of the date of this Order, Mr. Stanley shall provide a copy of this
21 Order to all persons and courts identified pursuant to paragraph (c) of this Order with notice to
22 Defendants' Counsel of same; and

23 (e) Mr. Stanley shall take reasonable efforts to retrieve or ensure the destruction of all
24 unauthorized Confidential Information to all persons identified pursuant to paragraph (c) of this Order.

25 **IT IS SO ORDERED:**

1 Dated: August 18, 2025
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HON. LISA J. CISNEROS
United States Magistrate Judge